

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

)	
MAKSIM TSVETOVAT, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO. 1:12CV510 TSE
)	
SEGAN, MASON & MASON, P.C.,)	
)	
Defendant.)	
)	

MOTION FOR SANCTIONS

Defendant, Segan, Mason & Mason, P.C. (“Segan Mason”), by counsel, moves the Court to impose sanctions against M. Nawaz Raja and Neelum Nawaz Raja (the “Rajas”). Segan Mason seeks sanctions against the Rajas in the amount the attorneys’ fees it incurred as a result of the blatant misrepresentations and baseless accusations asserted by the Rajas in the course of this litigation. The reasons in support of this motion are more fully set forth in Segan Mason’s Memorandum in Support, filed contemporaneously herewith and incorporated by reference, which sets forth the factual and legal basis for sanctions and the appropriate quantum of sanctions.

WHEREFORE, Segan Mason respectfully requests that the Court grant its Motion for Sanctions and enter judgment, jointly and severally, against the Rajas for their deplorable actions in this case.

Respectfully submitted,

SEGAN, MASON & MASON, P.C.

By: "/s/"
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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I also hereby certify that I have mailed (via certified mail) a true and correct copy of this Response to the following:

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